

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JOHN KARARO, et al. individually, and on)	
behalf of all other Illinois citizens similarly)	
situated,)	Case No. 23-cv-02187
Plaintiffs,)	
v.)	
)	District Judge Jorge L. Alonso
OLD DOMINION FREIGHT LINE INC.,)	
)	Magistrate Judge Heather K. McShain
Defendant.)	

JOINT NOTICE OF SETTLEMENT AND MOTION TO STAY PROCEEDINGS

NOW COME the Plaintiffs John Kararo, Sean Walker, Ian Travis, Melvyn L. Caison Jr., Gabriel Castellano, and Diego Delgado (“Plaintiffs”) and Defendant Old Dominion Freight Line, Inc. (“Defendant”), by their counsel (hereafter “the Parties”), and hereby notify the Court that the Parties have reached an agreement in principle to fully resolve this putative class action matter brought under the Illinois Biometric Information Privacy Act, which agreement is documented in a signed term sheet. The Parties are in the process of completing the settlement agreement and anticipate filing a Motion for Preliminary Approval of the Settlement Agreement in the near future.

Magistrate Judge Heather K. McShain stayed discovery proceedings through December 30, 2024, to facilitate settlement negotiations. (Dkt. 236).

As those negotiations have now led to a settlement in principle, the Parties respectfully request the District Court to stay this matter in its entirety, except for settlement-related proceedings, including any existing case deadlines.

WHEREFORE, for the reasons set forth above, the Parties respectfully request that this Court enter an order staying this matter in its entirety except for settlement-related proceedings, including all existing case deadlines, and grant the Parties any additional relief the Court deems just and proper.

Date: December 12, 2024

Counsel for Plaintiffs

By: /s/ James C. Vlahakis

James C. Vlahakis
VLAHAKIS LAW GROUP LLC
20 N. Clark Street, Suite 3300
Chicago IL 60602
312-766-0511 (office)
312-648-6127 (direct)
jamesv@vlahakislaw.com

Respectfully submitted,

Counsel for Defendant

By: /s/ Jason A. Selvey

Jody Kahn Mason
Jason A. Selvey
Hannah Griffin Garlough
Jackson Lewis P.C.
150 N. Michigan Ave. Suite 2500
Chicago, IL 60601
(312) 787-4949
Jody.Mason@jacksonlewis.com
Jason.Selvey@jacksonlewis.com
Hannah.Garlough@jacksonlewis.com